

1258-990

4/25/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

Nadiyah A. McCarroll  
Lonza  
90 Boroline Road  
Allendale, NJ 07401

APR 25 2013

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Subject: Triadine 10 Industrial Microbiostat  
EPA Reg. No. 1258-990  
Amendment Letter dated March 28, 2013

This letter acknowledges receipt of the Notification identified above submitted under the provisions of section 3(c)(9) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended and PR Notice 98-10. This Notification requests:

1. Changing the headings "Active Ingredients" and "Inert Ingredients" are equally prominent on the label with the same size and character type.
2. Update the order of the First Aid statements
3. Moved the statement "This pesticide is a chelating agent and should not be used with other chelating agents or chlorine" to the Physical and Chemical Hazards section
4. Added the statement "Use of this chemical in paints, stains, coatings, and institutional and household cleaning products, is prohibited" to the Use Directions section
5. "Paints" has been removed from the header "For the in-can preservation of latex emulsions used in adhesives, caulks, patching compounds, sealants, pastes grouts"
6. Added the statement "For metal working fluids, the maximum use concentration is 500 parts per billion (ppb) of active ingredient"
7. Removed "and skin burns" from the precautionary language.

Based on a review of the submitted information, this notification is acceptable. This information has been made a part of your file.

Should you have any questions concerning this letter, please contact Elizabeth Hernandez at (703) 347-0241.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Swindell", is written over the typed name.

Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other:

OPP Identifier Number

### Application for Pesticide - Section I

1. Company/Product Number 1258-990	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>Triadine 10 Industrial Microbiostat</b>	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) <b>Arch Chemicals, Inc. 5660 New Northside Drive, Suite 1100 Atlanta, GA 30328</b>		6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____
<b><u>PLEASE SEND ALL CORRESPONDENCE TO</u></b> <b><u>"CONTACT POINT" LISTED BELOW</u></b> <input type="checkbox"/> Check if this is a new address		

### Section - II

☐ Amendment - Explain below. ☐ Final printed labels in response to Agency letter dated \_\_\_\_\_  
☐ Resubmission in response to Agency letter dated \_\_\_\_\_ ☐ "Me Too" Application  
☒ Notification - Explain below. ☐ Other - Explain below

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

### Notification Per PR Notice 98-10: See Cover Letter for Details

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: *N. McCarroll*

Date: 2013-03-28

### Section - III

1. Material This Product Will Be Packaged In:		2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. varies No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
*Certification must be submitted			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container varies	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled <input type="checkbox"/> Other			

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name <b>Nadiyah A. McCarroll</b>	Title Sr. Regulatory Services Associate	Telephone No. (Include Area Code) 201.316.9213
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>N. McCarroll</i>	3. Title <b>Sr. Regulatory Services Associate</b>	
4. Typed Name <b>Nadiyah A. McCarroll</b>	5. Date <b>March 28, 2013</b>	

Via FedEx

Marshall Swindell, PM-33  
Document Processing Desk [NOTIF]  
Office of Pesticide Programs (7504P)  
US Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2227 S. Crystal Drive  
Arlington, VA 22202

Lonza Inc  
c/o Allendale  
90 Boroline Road  
Allendale, NJ 07401, USA

Nadiyah A. McCarroll  
Regulatory Services

Tel 201-316-9213  
nadiyah.mccarroll@lonza.com

March 28, 2013

**SUBJECT: Label Notification as per PR Notice 98-10**

**PRODUCTS: Triadine 10 Industrial Microbiostat (EPA Reg. No. 1258-990)**

Dear Mr. Swindell:

On behalf of Arch Chemicals, Inc. (now a part of Lonza), I am submitting this Notification to add changes to the label as per the Agency's comments based on the Hexahydro-1,3,5-tris(2-hydroxyethyl)-s-triazine Reregistration Decision dated April 24, 2012. The following changes have been applied to the above referenced product label:

- "Active Ingredients" and "Inert Ingredients" are equally prominent on the label with the same size and character type.
- The order of the First Aid statements has been updated.
- The statement "made of any waterproof material" has been added to the PPE section of the label
- The statement "This pesticide is a chelating agent and should not be used with other chelating agents or chlorine" has been moved under the "Physical and Chemical Hazards" Section of the label
- The statement "Use of this chemical in paints, stains, coatings, and institutional and household cleaning products, is prohibited has been added under the Directions of use section.
- "Paints" has been removed from the header "For the in-can preservation of latex emulsions used in adhesives, caulks, patching compounds, sealants, pastes grouts"
- The Statement "For metal working fluids, the maximum use concentration is 500 parts per billion (ppb) of active ingredient".
- "and skin burns" has been removed from the precautionary language.

To address the Agency's comments regarding the Storage and Disposal statements being placed in a text box for prominence, we disagree with your suggestion. It is not required by the provisions of PR notice 2007-4. Also, the label review manual states that "Blocking these statements with a solid line (a box) is SUGGESTED as a means of increasing their prominence. This does not mean that blocking with a box or a line is required. All of our final printed labels do employ a bold heading for the storage and disposal section that sets it apart and increases its prominence, so the stipulation of the label review manual is therefore satisfied.

To support this notification, the following documents are enclosed for your review:

1. Application for Notification; FRM 8750-1
2. One (1) copy of the proposed label with highlighted changes; and
3. Two (2) clean copies of the proposed label.

If you have any questions or need any additional information, please feel free to contact me at [nadiyah.mccarroll@lonza.com](mailto:nadiyah.mccarroll@lonza.com) or 201-316-9213.

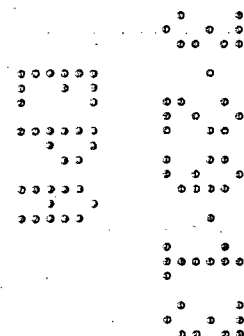
Best Regards

Lonza Inc.



Nadiyah A. McCarroll

Sr. Regulatory Services Associate



## TRIADINE® 10 INDUSTRIAL MICROBIOSTAT

### Active Ingredients:

Sodium, 2-pyridinethiol-1-oxide .....	6.56%
Hexahydro-1,3,5-tris (2-hydroxyethyl)-s-triazine. ....	65.95%
Inert Ingredients.....	<u>27.49%</u>
Total .....	100.00%

EPA Reg. No. 1258-990

EPA Est. No. 1258-NY-3

**KEEP OUT OF REACH OF CHILDREN**

## DANGER

SEE FIRST AID & ADDITIONAL PRECAUTIONARY STATEMENTS ON SIDE PANEL

### MANUFACTURED FOR:

Arch Chemicals, Inc.

5660 New Northside Drive, Suite 1100

Atlanta, GA 30328

Made in the USA.

TRIADINE® is a registered trademark of Arch Chemicals, Inc.

Net Weight as indicated on container.

**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER:** Corrosive. Causes irreversible eye damage. Harmful if swallowed or absorbed through skin or inhaled. Do not get in eyes, on skin, or on clothing. Avoid breathing spray mist. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

**PERSONAL PROTECTIVE EQUIPMENT (PPE):**

Applicators and other handlers must wear: long sleeved shirt and long pants, socks and shoes, chemical-resistant gloves (such as rubber gloves or made of any waterproof material), goggles and face shield.

**USER SAFETY REQUIREMENTS:** Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing.

**FIRST AID:**

**If in Eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for treatment advice.

**If on Skin or Clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment advice.

**If Swallowed:** Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

**If Inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth, if possible. Call a Poison Control Center or doctor for further treatment advice.

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

**In case of emergency, for additional information call 1-800-654-6911.**

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**PHYSICAL AND CHEMICAL HAZARDS:** Do not store or mix with strong oxidizing agents or strong (concentrated) acids. In case of contamination, do not reseal container. If possible, isolate container in open air or well-ventilated area. Fumes caused by contamination may be hazardous. This pesticide is a chelating agent and should not be used with other chelating agents or chlorine.

**STORAGE AND DISPOSAL:** Do not contaminate water, food, or feed by storage or disposal.

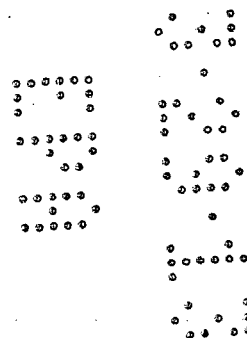
**PESTICIDE STORAGE:** Do not store above 100 degrees F. (38 deg. C.). Keep container tightly closed when not in use. Do not store with strong oxidizing agents or strong (concentrated) acids.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Triple rinse container promptly after emptying. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

[For containers > 5 gallons] Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

[For containers < 5 gallons] Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.



**DIRECTIONS FOR USE:** It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons.

Use of this chemical in paints, stains, coatings, and institutional and household cleaning products, is prohibited.

**<sup>1</sup>FOR THE IN-CAN PRESERVATION OF LATEX EMULSIONS USED IN ADHESIVES, CAULKS, PATCHING COMPOUNDS, SEALANTS AND PASTES GROUTS AND PAINTS:** To inhibit microbial growth in latex emulsions for a period of up to 1 year, a dosage of up to 1500 ppm of this product (0.15 lbs. of this product per 100 lbs. of emulsion) is recommended. This product may be added at any time during the formulation procedure by pouring from the container.

**<sup>1</sup>FOR THE PRESERVATION OF AQUEOUS ANALYTICAL AND DIAGNOSTIC REAGENTS USED IN CHEMICAL AND CLINICAL ANALYSIS:** Addition of 300 ppm to 500 ppm of this product inhibits the growth of bacteria in aqueous analytical and diagnostic reagents (0.03 lb. to 0.05 lb. of this product per 100 lbs. of reagent).

**<sup>1</sup>IN AQUEOUS SYNTHETIC FIBER LUBRICANTS (SPIN FINISHES):** Addition of up to 1000 ppm of this product will inhibit the growth of bacteria and the formation of slime in synthetic fiber lubricants for periods of two to four weeks during use. (0.1 lb. of this product per 100 lbs. of lubricant).

**<sup>1</sup>IN AQUEOUS-BASED INKS:** Addition of up to 5000 ppm of this product will inhibit the growth of bacteria and fungi in aqueous-based inks. (0.5 lbs. of this product per 100 lbs. of ink).

**TO INHIBIT THE GROWTH OF BACTERIA AND FUNGI IN AQUEOUS METALWORKING, CUTTING, COOLING AND LUBRICATING FLUIDS:** Add up to 2000 ppm (0.2% v/v) of this product to the solution (20 gallons per 10,000 gallons) by pouring from container as needed. When adding fresh, diluted fluid to compensate for dragout or other losses, add this product to the make-up fluid according to the above directions. Frequent checks (at least once a week) of the bacterial and fungal population in the system should be made using standard microbiological plate count procedures or any of the commercial "dip-stick" type devices. When the bacterial count reaches  $10^7$  and/or the fungal count reaches  $10^3$  organisms per ml, add additional product at the initial dosage rate.

The fluid should be checked at least once a day with a refractometer (or other suitable means) to determine if water loss by evaporation has occurred. Make-up water should be added daily to compensate for such losses. The fluid should be monitored at least once a week (depending on the metalworking operation involved) for the following: Tramp oil, pH, odor, oil droplet size, and anticorrosion properties. If any of these parameters are outside of the specifications established for the system in question, they should be brought up to the specifications by the addition of suitable additives or the fluid should be discarded and replaced after cleaning the system. Add this product to the fresh fluid according to the above directions. Contaminated fluid systems should be cleaned prior to the initial addition of this product. Drain the system, clean with a cleaner designed for this purpose, rinse with water and refill with fresh fluid. This product may be added to the fluid at the time it is prepared (diluted) or to the reservoir (sump) containing the fluid after it is put into use. If it is added to the reservoir, the fluid should be circulated after addition to ensure mixing.

For metal working fluids, the maximum use concentration is 500 parts per billion (ppb) of active ingredient.

<sup>1</sup>Not approved for use in California





**<sup>1</sup>TO INHIBIT THE GROWTH OF BACTERIA AND FUNGI IN METALWORKING, CUTTING, COOLING AND LUBRICATING FLUID CONCENTRATES:** Add an amount that will give up to a 2000 ppm solution. The amount required in the concentrate will depend on the end use dilution. To calculate the correct amount of this product to incorporate into the concentrate:

1. Determine the desired dose of this product required for the dilute fluid (i.e., 0.2% or 2000 ppm).
  2. Determine end-use concentration of the fluid (i.e., 0.05 or 5%).
- Divide the required dose of this product by the end-use concentration of the fluid (i.e.,  $0.2/0.05 = 4$ ), then 4% (by weight based on total batch weight of coolant concentrate) is the amount of this product to incorporate into the fluid concentrate so that a 5% dilution will contain 2000 ppm of this product.

The following chart describes other dilutions:

<u>Level of Triadine 3 Desired In End-Use Diluted Fluid</u>	<u>End Use Dilution of Conc</u>	<u>Amt. Of Triadine 3 to Add to Concentrate</u>
2000 ppm	5%	4% (40,000ppm) 40 gal./1000 gal. Conc
1500 ppm	5%	3% (30,000ppm) 30 gal/1000 gal Conc.
1000 ppm	5%	2% (20,000ppm) 20 gal/1000 gal Conc.
2000 ppm	4%	5% (50,000ppm) 50 gal/1000 gal. Conc.
1500 ppm	4%	3.75% (37500ppm) 37.5gal/1000 gal Conc.
1000ppm	4%	2.5% (25,000ppm) 25 gal/1000 gal Conc.

<sup>1</sup>Not approved for use in California

